

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

Case No. 4:21-MJ- 111

SIMON GALARZA (01)

ALEXANDER GALARZA (02)

FERNANDO GALARZA (03)

JEROME PHILLIPS (04)

CRIMINAL COMPLAINT

I, Robert Owen, being duly sworn, state the following is true and correct to the best of my knowledge and belief, but are not inclusive of all the evidence or information in the case:

Conspiracy to Possess a Controlled Substance with Intent to Distribute

Beginning in or before February 2021, and continuing until on or about February 26, 2021, in the Fort Worth Division of the Northern District of Texas, and elsewhere, defendants **Simon GALARZA, Alexander GALARZA, Fernando GALARZA-Colunga and Jerome PHILLIPS**, along with others known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), namely to possess with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of Methamphetamine, a Schedule II controlled substance.

In violation of 21 U.S.C. § 846 (21 U.S.C. §§ 841(a)(1) and (b)(1)(A)).

I am an "investigative or law enforcement officer of the United States" within the meaning of 18 U.S.C. § 3061. I am currently assigned as a Task Force Officer with the Drug Enforcement Administration in Fort Worth, Texas. This complaint is based on the following facts

1. In February 2021, an undercover DEA Task Force Officer (hereinafter referred to as UC) began receiving/making a series of consensually recorded telephone calls to/from Simon GALARZA, who was identified as a multi-kilogram crystal methamphetamine distributor operating in the Dallas-Fort Worth, Texas area. Following a series of telephonic communications, Simon GALARZA agreed to sell the UC three kilograms of crystal methamphetamine at a negotiated price of \$8,500.00 per kilogram, utilizing common street terminology in Spanish. The UC and Simon GALARZA agreed to conduct the drug transaction at a Home Depot parking lot located in Arlington, Texas.

3. On or about February 26, 2021, Agents established surveillance at a residence identified during this investigation located at 222 East Woodin Boulevard, Dallas, Texas and noted a white Dodge Challenger was parked in front of the residence. Agents observed Simon GALARZA, Jerome PHILLIPS and Fernando GALARZA depart the residence. Simon GALARZA entered a Ford Expedition via the driver door and retrieved an opaque colored bag. During this time, a red Ford F-150 arrived at the residence and Simon GALARZA entered the Ford F-150 via the passenger door carrying the opaque bag. Agents noted that Fernando GALARZA and Jerome PHILLIPS entered the white Dodge Challenger and departed the residence along with the Ford F-150 and drove in tandem. Surveillance was maintained on the two vehicles until they arrived at the Home Depot in Arlington, Texas.

4. Upon arrival to the Home Depot parking lot, a DEA Confidential Source, hereinafter referred to as CS, communicated with Simon GALARZA via telephone and

provided him (GALARZA) with instructions to the CS's location within the parking lot. As the Ford F-150 parked beside to the CS's vehicle, Agents observed the Dodge Challenger park to the west of the Ford F-150. The DEA CS approached the Ford F-150 and following a short conversation, Simon GALARZA displayed approximately three kilograms of a crystal substance purported to be methamphetamine to the CS. The bust signal was given and Agents with the DEA FWDO arrested Alexander GALARZA - driver of the Ford F-150, Simon GALARZA - passenger of the Ford F-150, Fernando GALARZA - driver of the Dodge Challenger and Jerome PHILLIPS - passenger of the Dodge Challenger.

5. Agents conducted a probable cause search of the aforementioned vehicles. During a search of the Ford F-150, Agents located an opaque air mattress bag containing approximately three kilograms of crystal methamphetamine in the backseat floorboard. A field test of the crystallized substance produced a presumptive positive test for the presence of methamphetamine. Agents located a Sig Sauer P226 in the driver's door handle and a Glock 19 in the driver's side floorboard where Alexander GALARZA was seated. Agents inspected the Glock 19 and noted the firearm was loaded with a round in the chamber. Agents also located a Regent M9 1911 firearm located in a front passenger side compartment of the center console. Agents inspected the Regent M9 1911 and noted the firearm was loaded with a round in the chamber. Further, during a search of Simon GALARZA, agents located a 1911 magazine in the pocket of his jacket which matched the magazine inserted in the Regent M9 firearm located beside where GALARZA was

sitting in the front passenger side of the Ford F-150. Agents also located an assortment of ammunition in the vehicle's glove compartment.

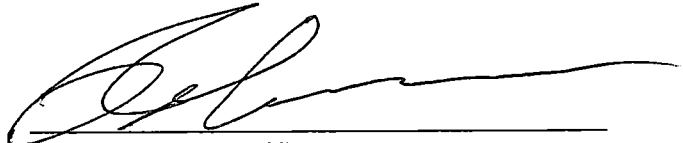
6. During a search of the white Dodge Challenger, Agents located a FN Herstal Five-seven firearm in the driver's side floorboard where Fernando GALARZA was seated. Agents inspected the FN Herstal and noted the firearm was loaded with a round in the chamber. Agents also located a Draco AK-47 rifle in the passenger side floorboard where Jerome Phillips was seated. Agents inspected the Draco AK-47 rifle and noted the rifle was loaded with a round in the chamber. All firearms located were within immediate reach of the occupants of the vehicles.

7. Later that day, DEA FWDO obtained a federal search warrant for the residence located at 222 East Woodin Boulevard Dallas, Texas.

8. On or about February 27, 2021, the Dallas Police Department (DPD) SWAT team executed the search warrant at the residence. Members of the DEA FWDO conducted a search of the residence and located approximately seven ounces of a substance believed to be black tar heroin in the kitchen refrigerator and approximately 29.5 grams of a substance believed to be crack cocaine above the kitchen's ceiling vent. Agents also located an assortment of ammunition in a kitchen drawer. On the living room floor, Agents observed a semi-inflated Intext air mattress. The day prior, on February 26, 2021, Agents seized approximately three kilograms of crystal methamphetamine that was located in an opaque Intext air mattress bag found in the Ford F-150 occupied by Alexander and Simon GALARZA. Additionally, during the arrest that occurred on February 26, 2021, agents seized a set of residential keys that were attached to the key

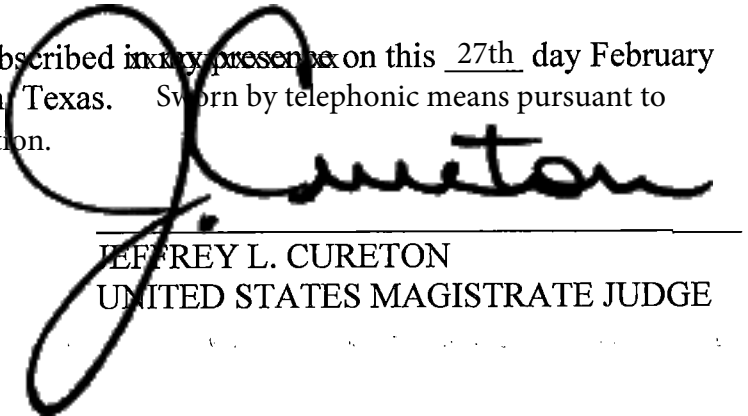
ring of the Dodge Challenger car keys. Agents further learned the residential keys locked/unlocked the doors to the residence located at 222 East Woodin Boulevard, Dallas, Texas.

9. Although I have not listed all the facts regarding this conspiracy, I believe that the facts stated above establish probable cause that the above-named defendants, and others known and unknown, have violated 21 U.S.C. § 846 (21 U.S.C. § 841(a)(1) and (b)(1)(A)).



Robert Owen, Affiant
Drug Enforcement Administration

Sworn to before me, and subscribed ~~in my presence~~ on this 27th day February 2021 at 6:12 p.m., in Fort Worth, Texas. Sworn by telephonic means pursuant to Fed. R.Cr.P. 4.1 using Zoom application.



JEFFREY L. CURETON
UNITED STATES MAGISTRATE JUDGE